

EXHIBIT A16

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14 UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA

16 Cung Le, Nathan Quarry, Jon Fitch, Brandon
17 Vera, Luis Javier Vazquez, and Kyle
18 Kingsbury on behalf of themselves and all
others similarly situated,

19 Plaintiffs,
v.

20 Zuffa, LLC, d/b/a Ultimate Fighting
21 Championship and UFC,

22 Defendant.

Case No.: 2:15-cv-01045-RFB-(PAL)

**[PROPOSED] DISCOVERY PLAN AND
SCHEDULING ORDER**

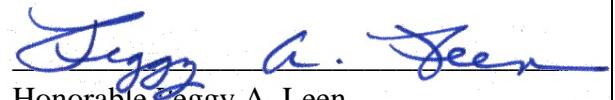
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Under Fed. R. Civ. P. 26(f) and Local Rule 26-1, the respective parties conducted a discovery planning conference on April 15, 2015. The parties previously submitted a joint proposal to this Court setting the case event dates up through the Class Certification hearing (ECF No. 206 at pp. 34-35). Plaintiffs also proposed dates that set out the timeframe of the briefing of dispositive motions, which this Court accepted and Ordered. (ECF No. 207). Upon invitation from the Court to submit a Proposed Discovery Plan and Scheduling Order, on September 23, the parties submitted competing proposals for the timing for the upcoming case deadlines. ECF Nos. 297-1 and 297-2. On September 27, this Court held a Status Conference and Ordered that the case management deadlines shall be extended by 30 days without prejudice. (ECF No. 304). For the convenience of the parties and the Court, the parties now submit the below Discovery Plan and Scheduling Order in accordance with this Court's Order, adjusted to account for deadlines falling on weekends and deadlines falling on or around holidays.

Close of Fact Discovery	May 1, 2017
Plaintiffs' Opening Expert Reports (class and merits)	May 30, 2017
Last Day to Depose Experts Concerning Opening Reports	June 26, 2017
Opposition Expert Reports	July 24, 2017
Last Day to Depose Opposition Experts	August 21, 2017
Reply Expert Reports	September 5, 2017
Daubert Motions	October 2, 2017
Class Certification Motion	October 2, 2017
Daubert Opposition Briefs	November 21, 2017
Class Certification Opposition Brief	November 21, 2017
Daubert Reply Briefs	December 22, 2017
Class Certification Reply Brief	January 16, 2018
Class Certification Hearing	Court's Convenience
Summary Judgment Motions	March 26, 2018
Summary Judgment Opposition Briefs	April 25, 2018
Summary Judgment Reply Briefs	May 25, 2018

IT IS SO ORDERED.

Date: October 14, 2016


Honorable Peggy A. Leen
UNITED STATES MAGISTRATE JUDGE

1 Dated: October 12, 2016

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3 By: /s/ Stacey K. Grigsby

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1 Dated: October 12, 2016

Respectfully Submitted,

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Additional Class Counsel and Attorneys for Individual and Representative Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez, Brandon Vera, and Kyle Kingsbury

ATTESTATION OF FILER

The signatories to this document are myself and Michael Dell'Angelo, and I have obtained Mr. Dell'Angelo's concurrence to file this document on his behalf.

Dated: October 12, 2016

By: /s/ Stacey K. Grigsby

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that service of the foregoing **Discovery Plan and Scheduling Order** was served on October 12, 2016 via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ Michael Kim

An Employee of Boies, Schiller and Flexner LLP